

BRETT L. TOLMAN, United States Attorney (#8812)
D. LOREN WASHBURN, Assistant United States Attorney (#10993)
MARTY WOELFLE, Trial Attorney (AZ #009363)
Attorneys for the United States of America
185 South State Street, Suite 400
Salt Lake City, Utah 84111
Telephone: (801) 524-5682

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA)	
)	
)	Case No. 2:07CR00286 TS
Plaintiff,)	
)	
v.)	GOVERNMENT’S MOTION FOR
)	LEAVE TO FILE OVERLENGTH
)	MEMORANDUM IN OPPOSITION TO
BARON LOMBARDO, et. al)	DEFENDANTS’ MOTION TO DISMISS
)	BASED ON TREATY OBLIGATIONS
Defendants.)	AND DOMESTIC AND
)	INTERNATIONAL LAW
)	

Judge Ted Stewart

The United States of America, by and through the undersigned attorneys, hereby moves the Court for leave to file a twenty-seven page Memorandum in Opposition to the Defendants’ Motion to Dismiss Based on Treaty Obligations and Domestic and International Law. A memorandum of this length is necessary because of the number of legal arguments raised by the Defendants in their thirty-two page Motion.

For these reasons, the United States request leave of the Court to file a memorandum of twenty-seven pages opposition to the Defendants' Motion to Dismiss.

A proposed Order is submitted herewith.

Respectfully submitted this 2nd day of November, 2007.

BRETT L. TOLMAN
United States Attorney

/s/ D. Loren Washburn
D. LOREN WASHBURN
Assistant United States Attorney

/s/ Marty Woelfle
MARTY WOELFLE
Trial Attorney
Organized Crime & Racketeering Section

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2007, the foregoing was filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

D. Gilbert Athay
43 East 400 South, Suite 325
Salt Lake City, UT 84111-2767

David V. Finlayson
David V. Finlayson, LLC
43 East 400 South
Salt Lake City, UT 84111

Scott C. Williams
Scott C. Williams LLC
43 East 400 South
Salt Lake City, UT 84111

Mark R. Gaylord
Ballard Spahr Andrews & Ingersoll, LLP
One Utah Center - Suite 600
201 South Main Street
Salt Lake City, UT 84111-2221

G. Fred Metos
McCaughey & Metos
10 West Broadway, Ste. 650
Salt Lake City, UT 84101

Vanessa M. Ramos
Utah Federal Defenders
46 W. Broadway, Ste. 110
Salt Lake City, UT 84101

Michael Pancer
4th Floor
105 West F Street
San Diego, CA 92101-6036

Fred D. "Pete" Gibson III
Lionel Sawyer & Collins
1700 Bank of America Plaza
300 South Fourth Street

/s/ D. Loren Washburn